

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION

DAVITA M. KEY,

Plaintiff,

v.

HYUNDAI MOTOR  
MANUFACTURING, ALABAMA,  
LLC; HYUNDAI ENG AMERICA,  
INC.; and DYNAMIC SECURITY,  
INC.

Defendants.

Case No. 2:19-CV-767-ECM

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**PLAINTIFF'S WILL USE EXHIBIT 18**

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**Removal from Hyundai Motor Manufacturing**

From: Gloria Robinson- Account Manager

To: Dr. Ray Cureton

Date: August 1, 2017

This is concerning the removal of Davita Key from HMMA site.

On Wednesday July 19, 2017 @ 10am Ms. Key arrived to be interviewed for the Mailroom position at HMMA. The interviewers consisted of Lt. Maurice Chambliss and I.

Once I had determined Ms. Key met the criteria for the Mailroom position, I had only one concern as far as dress and appearance was concerned- that was her hair.

I asked Ms. C. Williams (HEA) to step into the conference room as a second opinion. Her initial reaction was that Ms. Key could not have the hairstyle she was wearing as a HMMA security officer, even working in the capacity of the mailroom.

Ms. Key asked what style she could wear. She was informed her hair had to be in a neat appearance as a minimum, and dreads could not be worn at HMMA for security officers. She stated that her hair dresser had her hair in a bun and wanted to show a picture of her with that style to see if it was acceptable.

The picture she showed us was acceptable and she agreed to obtain that style.

Monday, July 31 2017 @ 0730 hours (her first day of work), Ms. Key asked to speak with me on a personal matter. I called Lt. Chambliss into the room and informed Ms. Key that any matters that she needed a supervisor for would go through Lt. Chambliss. It was at this time she stated she found out July 28, 2017 that she was pregnant; however she had a doctor's excuse stating that she could return to work with no restrictions. Ms. Key was not working at HMMA July 28, 2017.

A little while later, maybe five minutes or so, Ms. Williams come into the back office and asked me why Ms. Key still had the same hairstyle she was wearing on July 19. Ms. Key had departed the building, however she was summoned back to answer the question.

Ms. Key stated that during her training at Dynamic Security office, she asked the office manager was there anything wrong with her hair. Ms. Key claims that the office manager told her there was nothing wrong with as far as she can see. Ms. Key stated at that point she felt she was given the go ahead to wear her hair the way it was. Ms. Williams asked Ms. Key if she could wear a non-descriptive hat, she said she could. She asked Ms. Williams to see a policy on hairstyles, Ms. Williams showed it to her from her computer, and again explained that HMMA has a personal appearance policy for the security officers that work with the security company. I asked her if she could make an appointment with her hairdresser, she claimed that it takes a while to get an appointment. I asked her to call her hairdresser and to call me back to let me know if she was able to schedule an appointment and we will go from there. Ms. Key was released for the day. Ms. Howell entered the security office and asked if we knew when Ms. Key was due. I just assumed it would be 9 months from now if she just found out July 28. Ms. Howell said no, Ms. Key told her January. I did call her and ask when she was due, she stated January.

Monday July 31 I contacted the office manager (Ms. Nicole) and asked her if she remembered having a conversation with Ms. Key about her hair. Ms. Nicole stated she did and thought it was a strange question but told her 'in my opinion I do not see anything wrong with it.' Ms. Nicole was taking the conversation as a general question, not one that concerned appearance standards at any site. Ms. Nicole stated that she did not know the background of why Ms. Key would ask this question.

Today, August 1, 2017 Ms. Key came to work and started working with Ms. LaTonya Howell (Mailroom employee and trainer). They both came into the back office, Ms. Howell spoke and I did not know Ms. Key was with her (my head was down doing paperwork) until she stood in front of my desk cubicle. It was at this time I saw Ms. Key wearing a grey hat. If she spoke when she came in, I did not hear her.

A little while later, Ms. Howell telephoned Ms. Williams and stated that Ms. Key felt she was being discriminated against. When asked concerning what, Ms. Howell said because of her pregnancy. Lt. Chambliss was asked to go to the mailroom and bring Ms. Key back to the security building. Lt. Chambliss and I spoke with Ms. Key in the security building conference room. I asked her about the comment she made to Ms. Howell. Ms. Key asked if she had been recorded or if I had proof that she said that. I went on to explain to her that it was my job, once I learn a employee feels that they are being discriminated or harassed in any



way I must look into it and come to some type of resolution. I asked her again if she felt she was being discriminated against, she said no comment. Then she went on to talk about her being able to wear her hat. I said I did not bring that up I wanted to know how she was being discriminated against since she made a comment to a fellow co-worker. I also said that there are only two of you and I didn't want any hostile work environment for anyone, we are all here to try and get along. I also reminded her of the July 19 interview when she said she could get her styled a certain way. It was then she said the office told that her hair was in standards to include the length and there was nothing wrong with her hair. I recounted the conversation I had with the office manager that disputed what she (Ms. Key) was currently saying. She further went on to state that by law she could ask to see a policy concerning appearance. I again asked her if she felt she was being discriminated against and she again brought up that she was told she could wear a hat. I felt this conversation was going nowhere and informed Lt. Chambliss to take her back to the mailroom. When she returned to the mailroom she asked Ms. Howell if she told them that she felt she was being discriminated against, Ms. Howell stated yes, because that is what you said.

I was on my way to the Dynamic Security office on Wares Ferry when Lt. Chambliss called me and said Ms. Key wanted to file a complaint against Ms. Williams and I because of her hair and who she could talk to. I told him have Ms. Key depart the site and report to Ray Cureton with her complaint.

Cc: Ray Cureton-District Manager  
Gloria Robinson  
Dynamic Security  
Account Manager